

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
PECOS DIVISION

UNITED STATES OF AMERICA
vs.
SERGIO MENCHACA PIZARRO
AKA "MENCHACA, JR." AKA "EL
MENCHACA" AKA "EL ROBIN"

CRIMINAL NO. 4:23-CR-00371

**DEFENDANT SERGIO MENCHACA PIZARRO'S
UNOPPOSED MOTION FOR CONTINUANCE**

TO THE HONORABLE DAVID COUNTS, UNITED STATES DISTRICT JUDGE:

NOW COMES SERGIO MENCHACA PIZARRO, Defendant in the above styled cause of action and hereby files this his Unopposed Motion for Continuance by and through his attorney of record, J. Warren St. John, and will show the court the following:

1. The Defendant would show that the case is presently set for Trial on November 20, 2023. The Government has indicated that they are requesting a Designation of Complex Litigation based on their investigation of said matter;
2. The Government has indicated to my Office that it has been retrieving discovery from Field Agents on this case, but that they have not been provided all of the documents necessary in order to release comprehensive discovery;
3. The Attorney for the Defendant needs additional time to properly counsel with his Client, to review the discovery with his Client, and to perform his due diligence and investigation of the alleged facts of the case;
4. The Attorney for the Defendant has retained a retired Special Agent with the FBI to assist in the Defendants investigation and the Investigator needs ample amount of

time to investigate said matter;

5. The Defendant's attorney would request that the settings in the instant matter be reset for *at least forty-five (45) days* from November 20, 2023, and that all additional deadlines be rescheduled to accommodate the rescheduled instant matter; and
6. The Defendant would further show that said Motion for Continuance is not sought for delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that said Motion be granted in all things, that the instant matter be reset for *at least forty-five (45) days* from November 20, 2023, that all additional deadlines be rescheduled to accommodate the rescheduled instant matter and that the Defendant be excused from having to appear as currently scheduled.

Respectfully submitted,

s/J. Warren St. John
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ATTORNEY FOR DEFENDANT (1)

CERTIFICATE OF CONFERENCE

This is to certify that on October 3, 2023, I communicated with Mr. Scott Greenbaum, the Assistant United States District Attorney, in order to determine whether Mr. Greenbaum would oppose the granting of Defendant's Motion for Continuance. Mr. Greenbaum in UNOPPOSED to the Motion for Continuance..

s/J. Warren St. John
J. WARREN ST. JOHN

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2023, I electronically filed the foregoing document with the Clerk for the U.S. District Court, Western District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means: Mr. Scott Greenbaum.

s/J. Warren St. John
J. WARREN ST. JOHN

ATTORNEY FOR DEFENDANT (1)